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*Proposed Counsel to Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	
	)	Chapter 11
	)	
INTERNAP TECHNOLOGY SOLUTIONS INC.,	)	Case No. 20-22393 (RDD)
<i>et al.</i>	)	
	)	Joint Administration Requested
Debtors. <sup>1</sup>	)	

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**AMENDED NOTICE OF COMMENCEMENT OF  
CHAPTER 11 CASES AND AGENDA FOR FIRST DAY HEARING**

**PLEASE TAKE NOTICE** that on **March 16, 2020**, Internap Technology Solutions Inc., Case No. 20-22393; Internap Corporation Case No. 20-22394; Internap Connectivity LLC, Case No. 20-22396; DataGram, LLC, Case No. 20-10805; Ubersmith, Inc., Case No. 20-10806; SingleHop, LLC, Case No. 20-22399; and Hosting Intellect, LLC, Case No. 20-22398. (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “First Day Hearing”) has been scheduled for **March 17, 2020 at 2:00 p.m. (Prevailing Eastern Time)** before the Honorable Judge Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas St., White Plains, New York 10601-4140. In light of present COVID19 health recommendations, the First Day Hearing will only be conducted telephonically.

**PLEASE TAKE FURTHER NOTICE** that parties wishing to participate in the First Day Hearing must make arrangements through CourtCall by telephone at 1-888-882-6878.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Internap Technology Solutions Inc. (8343); Internap Corporation (5721); Ubersmith, Inc. (7677); SingleHop, LLC (4340); Internap Connectivity LLC (7920); Hosting Intellect, LLC (8435); and DataGram, LLC (3170). The location of the Debtors’ service address for purposes of these Chapter 11 Cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

**PLEASE TAKE FURTHER NOTICE** that an agenda with respect to the First Day Hearing is set forth below. Copies of each pleading identified below (the “First Day Pleadings”) can be viewed and/or obtained by: (i) accessing the Court’s website at <http://www.nysb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court, or (iii) from the Debtors’ proposed claims and noticing agent, Prime Clerk LLC. Note that a PACER password is needed to access documents on the Court’s website.

**PLEASE TAKE FURTHER NOTICE *that your rights may be affected*.** You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult with one).

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

### **AGENDA FOR FIRST DAY HEARING**

#### **I. Introduction**

1. Introduction – Dennis F. Dunne (Milbank LLP)

#### **II. Motions and Applications to Be Heard at the First Day Hearing**

1. ***DIP Financing Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [**Docket No. 23**]
2. ***Motion to Seal DIP Facility Fee Letter.*** Debtors’ Motion for Entry of an Order Authorizing Debtors to File DIP Facility Fee Letter Under Seal [**To Be Filed**]
3. ***Cash Management Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to (I) Continue Using Existing Cash Management System, Bank Accounts and Business Forms, and (II) Continue Intercompany Transactions, and (B) Authorizing Debtors’ Banks to Honor All Related Payment Requests [**Docket No. 7**]
4. ***All Trade Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Obligations Owed to Trade Creditors in the Ordinary Course of Business, (II) Confirming Administrative Expense Priority of Outstanding Purchase Orders, (III) Authorizing Financing Institutions to Honor

and Process Related Checks and Transfers, and (IV) Granting Related Relief [**Docket No. 12**]

5. ***Customer Programs Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Maintain and Administer Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto [**Docket No. 9**]
6. ***Utilities Motion.*** Debtors' Motion for Entry of an Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service [**Docket No. 11**]
7. ***Insurance Motion.*** Debtors' Motion for Order (I) Authorizing, but not Directing, the Debtors to (A) Continue to Maintain their Insurance Policies and Programs and Surety Bond Program and (B) Honor all Obligations with respect thereto and (II) Modifying the Automatic Stay with respect to the Workers' Compensation Program [**Docket No. 20**]
8. ***Joint Administration Motion.*** Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [**Docket No. 2**]
9. ***Prime Clerk Retention Application.*** Debtors' Application for Entry of Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [**Docket No. 5**]
10. ***Case Management Procedures Motion.*** Debtors' Motion for Entry of Order Implementing Certain Notice and Case Management Procedures [**Docket No. 17**]
11. ***Consolidated Creditor List and Matrix Motion.*** Debtors' Motion for Entry of Order (I) Authorizing Debtors to (A) File a Consolidated List of Creditors and (B) File a Consolidated List of Debtors' 30 Largest Unsecured Claims, (II) Authorizing Debtors to Redact Certain Personal Identification Information for Individual Creditors and Interest Holders, and (III) Approving Form and Manner of Notifying Creditors of Commencement of Chapter 11 Cases [**Corrected Filing at Docket No. 22**]
12. ***Scheduling Motion.*** Debtors' Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Establishing a Plan and Disclosure Statement Objection Deadline, (III) Approving Solicitation Procedures and Combined Notice, (IV) Approving Equity Notice Procedures, (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases, (VI) Directing that a Meeting of Creditors not be Convened, and (VII) Granting Related Relief [**Docket No. 4**]

13. ***Schedules and Statements Extension Motion.*** Debtors' Motion for Entry of Order Granting Extension of Time to File Schedules and Statements [**Docket No. 15**]
14. ***Equity Trading Motion.*** Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 362 for Entry of Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Claiming a Worthless Stock Deduction [**Docket No. 13**]
15. ***Record Date Motion.*** Debtors' Motion for Entry of an Order Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Certain Claims Against the Debtors' Estates [**Docket No. 14**]
16. ***Employee Benefits and Wages Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, but not Directing Debtors to (I) Pay Certain Prepetition Wages and Reimbursable Employee Expenses, (II) Pay and Honor Employee Benefits and (III) Continue Employee Benefits Programs and (B) Authorizing and Directing Financial Institutions to Honor all Related Checks and Electronic Payment Requests [**Docket No. 8**]
17. ***Taxes Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, but not Directing, Debtors to Pay (I) Taxes and Fees, and (II) Fees of Tax Service Providers, and (B) Authorizing and Directing Financial Institutions to Honor all Related Checks and Electronic Payment Requests [**Docket No. 10**]

### **III. Related Pleadings**

1. ***First Day Declaration.*** Declaration of Michael T. Sicoli in Support of Chapter 11 Petitions and First Day Motions [**Docket No. 3**]
2. ***Declaration in Support of DIP Financing Motion.*** Declaration of Adam Keil in Support of the DIP Financing Motion And Related Relief [**Docket No. 24**]
3. ***Consolidated Creditor Matrix.*** Notice of Filing Consolidated List of Creditors [**Docket No. 16**]

*[Remainder of Page Intentionally Left Blank]*

New York, New York  
Dated: March 17, 2020

/s/ Dennis F. Dunne

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